

EXHIBIT B
(Updated Privilege Log)

Donna Curling, et al. v. Brian P. Kemp, et al. Privilege Log

<i>Author</i>	<i>Recipient</i>	<i>Privileges</i>	<i>Description</i>	<i>Date*</i>
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Attorney-Work Product, Attorney-Client	Written communications between attorneys regarding responses to open records requests and the <i>Curling</i> subpoenas.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Attorney-Work Product, Attorney-Client	Written communications between attorneys regarding general representation of the Board of Elections.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Stephen Delk, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Stephen Delk, Esq.	Attorney-Work Product, Attorney-Client	Written communications between attorneys regarding responses to the <i>Curling</i> subpoenas.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Wesley Vickers (Coffee County Administrator)	Wesley Vickers, Jennifer Herzog, Esq., Tony Rowell, Esq.	Attorney-Client	Written communications regarding general representation of the Board of Elections, responding to open records requests and the <i>Curling</i> subpoenas.	Coffee County hired Wesley Vickers before July 1, 2020 (relevant time period). All communications occurred when Hall Booth Smith, P.C. or its attorneys served as County Attorney of Coffee County.
Jennifer Herzog, Esq., Nick Kinsley, Esq., Tracie Vickers (Coffee County Clerk)	Tracie Vickers, Jennifer Herzog, Esq., Nick Kinsley, Esq.	Attorney-Client	Written communications regarding responding to open records requests and the <i>Curling</i> subpoenas.	Coffee County hired Tracie Vickers before July 1, 2020 (relevant time period). All communications

				occurred when Hall Booth Smith, P.C. or its attorneys served as County Attorney of Coffee County.
Jennifer Herzog, Esq., Rachel Roberts (current Coffee County Elections Supervisor)	Rachel Roberts, Jennifer Herzog, Esq.	Attorney-Client	Written communications regarding responses to open records requests and the <i>Curling</i> subpoenas.	Communications began on or after December 13, 2021 and remain ongoing.
Jennifer Herzog, Esq., Tony Rowell, Esq., James Barnes (former Coffee County Elections Supervisor)	James Barnes, Jennifer Herzog, Esq., Tony Rowell, Esq.	Attorney-Client	Written communications regarding general elections office representation, responses to open records requests and the <i>Curling</i> subpoenas.	Communications (except for communications relating to the <i>Curling</i> subpoenas) began on or after April 1, 2021, 2021 and ceased on or before December 3, 2021, coinciding with James Barnes' employment with Coffee County. Communications regarding the <i>Curling</i> subpoenas began on July 13, 2022 and remain ongoing.
Jennifer Herzog, Esq., Misty Hampton (former Coffee County Elections Supervisor)	Misty Hampton, Jennifer Herzog, Esq.	Attorney-Client	Written communications regarding responses to open records requests.	Communications began on or after July 1, 2020 (relevant time period) and ceased on or before February 25, 2021, coinciding with Misty Hampton's employment with Coffee County.
Jennifer Herzog, Esq., Board of Elections Member(s)	Board of Elections Member(s), Jennifer Herzog, Esq.	Attorney-Client	Written communications regarding responses to open records request	Communications occurred between Jennifer Herzog and

			and the <i>Curling</i> subpoenas.	members of the Board of Elections during the board members' respective tenures as members of the board.
Jennifer Herzog, Esq., Tony Rowell, Esq., Board of Elections Member(s)	Board of Elections Member(s), Jennifer Herzog, Esq., Tony Rowell, Esq.	Attorney-Client	Written communications regarding various elections matters.	Communications occurred between Jennifer Herzog, Tony Rowell and members of the Board of Elections during the board members' respective tenures as members of the board.
Jennifer Herzog, Esq., Wesley Vickers	Wesley Vickers, Jennifer Herzog, Esq.	Attorney-Work Product	Written communications regarding SEB2020-250.	Coffee County hired Wesley Vickers before July 1, 2020 (relevant time period). All communications occurred when Hall Booth Smith, P.C. or its attorneys served as County Attorney of Coffee County.
Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Attorney-Work Product, Attorney-Client	Written communications regarding SEB2020-250.	All authors and recipients were employed by Hall Booth Smith, P.C. at all relevant times and served as the County Attorney for Coffee County at all relevant times.
Rebekah Ditto, Esq.		Attorney-Work Product	Attorney's notes regarding SEB2020-250	December 7, 2021 – December 13, 2021. However, Rebekah Ditto was employed

				with Hall Booth Smith, P.C., which served as County Attorney for Coffee County at this time.
Rebekah Ditto, Esq., Nick Kinsley, Esq., Board of Elections Member(s)	Board of Elections Member(s). Rebekah Ditto, Esq., Nick Kinsley, Esq.	Attorney-Client	Written communications regarding SEB2020- 250	December 7, 2021 – December 13, 2021. All communications occurred during the board members’ respective tenures as members of the board.
Rebekah Ditto, Esq., Wesley Vickers, Rachel Roberts	Wesley Vickers, Rachel Roberts, Rebekah Ditto, Esq.		Written communications regarding SEB2020- 250.	December 14, 2021 – December 15, 2021
Board of Elections Member(s)	Rebekah Ditto, Esq.	Attorney-Client, Work Product	Diagram for defense of SEB2020-250	December 13, 2021
Jennifer Herzog, Esq., Greg Hecht, Esq., and Ed Buckley, Esq.	Greg Hecht, Esq., Ed Buckley, Esq., Jennifer Herzog, Esq.	Attorney-Client, Work Product	Written communications regarding representation of Ms. Earnestine Thomas- Clark relating to <i>Curling</i> and Secretary of State.	July 13, 2022 - present
F.R.C.P. 26(b)(5)(A)(ii) only requires that the party describe the nature of the privileged material in a manner that will enable you to assess the claim. If you assert that a date is required, please provide the citation for same so that we may consider the matter further. The information provided above allows you to sufficiently assess the asserted privileges. The date is largely irrelevant as the dates of employment and the dates of holding positions on the board encompass the “relevant time period.” With the exception of James Barnes, who expressly retained our firm to represent him in responding to the Curling subpoenas, communications with employees or representatives of Coffee County occurred only during their tenure with Coffee County. It would be unduly burdensome to non-party Coffee County to require the identification of these irrelevant dates.				